



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

August 13, 2020

TAKING TEXAS TO THE TOP  
P.O. BOX 120296  
SAN ANTONIO, TX 78212

IDENTIFICATION NUMBER: C90017963

**Response Due Date**  
**09/17/2020**

REFERENCE: APRIL QUARTERLY REPORT (01/01/2020 - 03/31/2020)

Dear Filer:

This letter is prompted by the Commission's preliminary review of the Report of Independent Expenditures Made and Contributions Received (FEC Form 5) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** Additional information is needed for the following 6 item(s):

1. You filed 24 hour report(s) informing the Commission of independent expenditures made in support or opposition of federal candidates with "Canvassing" as the payee(s). However, the amounts and dates of public dissemination disclosed on these report(s) do not appear to correlate with the entries on Schedule 5-E of your quarterly report covering the applicable period. If you have filed 24 hour report(s) supporting independent expenditures not reflected on your quarterly report, you must amend your quarterly report for the appropriate reporting period to disclose these payments on Schedule 5-E. Please amend your report(s) to clarify this discrepancy and provide further information concerning these report(s). (11 CFR §109.10)
2. Your 24-hour reports, filed on 2/18/2020, disclosed independent expenditures that do not appear on Schedule 5-E of your quarterly filing (see attached). Please amend your report to include these expenditures or provide an explanation of this apparent discrepancy. (11 CFR § 109.10(b))
3. Your quarterly report discloses independent expenditures that do not appear on 24-hour reports (see attached).

Please be advised that Commission Regulations require that you file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election during the calendar year up to and including the

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20th day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e))

In addition, you are required to file 24-hour reports once your independent expenditures aggregate \$1,000 or more after the 20th day but more than 24 hours before 12:01 a.m. of the day of the election. The report must be received at the Commission by 11:59 p.m. Eastern Standard/Daylight Time of the day following the date on which the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$1,000 or more, you must file another 24-hour report disclosing these independent expenditures. (11 CFR § 109.10(d) and (e))

Please provide clarification regarding whether 24/48-hour reports were required but not filed. If the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

4. Line 7 of your FEC Form 5 filing discloses disbursements made for independent expenditure(s). Your filing also discloses contributions on Line 6, "Total Contributions."

Each person (other than a political committee) who made a contribution(s) to your reporting entity during this reporting period, whose contribution(s) had an aggregate amount in excess of \$200 within the calendar year, must be itemized on Schedule 5-A, including their identification information, date, and amount of such contribution(s). In addition, memo text must be used to indicate which of these persons made a contribution in excess of \$200 to your reporting entity for the purpose of furthering any independent expenditure. (52 U.S.C. §§ 30101(13) and 30104 (c)(1), (c)(2)(C)) (See <https://www.fec.gov/updates/fec-provides-guidance-following-us-district-court-decision-crew-v-fec-316-f-supp-3d-349-dc-2018/>.)

Please amend your report to include memo text or provide clarifying information.

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5. Your committee filed a 24-hour report (see attached) informing the Commission of independent expenditures made in support or opposition of federal candidates. Please be advised that itemized independent expenditures disclosed on 24 and 48-hour reports should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date the communication is publicly disseminated or distributed, the amount, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please amend the 24-hour report by providing the state. (11 CFR §104.4(b) and (c))

Please be advised that each state's presidential primary is considered a separate election for purposes of aggregating independent expenditures (see Advisory Opinion 2003-40). Independent expenditures that are made in support or opposition to a presidential primary candidate and publicly distributed or otherwise disseminated in six or more states, but do not refer to any particular state, should be listed as a single expenditure (i.e., without allocating among states), and the state with the next upcoming presidential primary among those states where the independent expenditure is distributed must be indicated in the state field. Additionally, filers must use descriptive memo text to indicate the specific states in which the communication is distributed. 11 CFR §§104.4(b)(3) (vii)(C) and 104.4(f)(2)

6. Line 7 of your FEC Form 5 filing discloses "Total Independent Expenditures" of \$50,537.92, however, Schedule 5-A only discloses \$30,000.00 in itemized receipts.

Each person (other than a political committee) who made a contribution(s) to your reporting entity during this reporting period, whose contribution(s) had an aggregate amount in excess of \$200 within the calendar year, must be itemized on Schedule 5-A, including their identification information, date, and amount of such contribution(s). In addition, memo text must be used to indicate which of these persons made a contribution in excess of \$200 to your reporting entity for the purpose of furthering any independent expenditure. (52 U.S.C. §§ 30101(13) and 30104 (c)(1), (c)(2)(C)) (See <https://www.fec.gov/updates/fec-provides-guidance-following-us-district-court-decision-crew-v-fec-316-f-supp-3d-349-dc-2018/>.)

Please amend your report to provide the missing information or provide clarifying information.

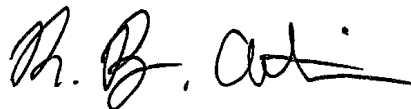
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**Please note, you will not receive an additional notice from the Commission on this matter. Requests for extensions of time in which to respond will not be considered.** Failure to comply with the provisions of the Act may result in an enforcement action against the entity. Any response submitted by your entity will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit [www.fec.gov/help-candidates-and-committees](http://www.fec.gov/help-candidates-and-committees). For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit [www.fec.gov/help-candidates-and-committees/request-additional-information](http://www.fec.gov/help-candidates-and-committees/request-additional-information). Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1196.

Sincerely,

A handwritten signature in black ink, appearing to read "B. B. Austin", written in a cursive style.

Bradley Austin  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

**Missing Schedule E****Taking Texas to the Top (C90017963)**

<b>Name</b>	<b>Date</b>	<b>Amount</b>	<b>Purpose</b>	<b>Candidate</b>
Taking Texas To The Top	2/16/20	\$2,287.50	Payroll - Estimated Through 3/3/2020	Cisneros, Jessica

**Missing 24 Hour Reports**  
**Taking Texas to the Top (C90017963)**

<b>Name</b>	<b>Date</b>	<b>Amount</b>	<b>Purpose</b>	<b>Candidate</b>
Texas Organizing Project	2/16/20	\$2,122.54	Payroll - Actual Cost Of IE On 24-Hour Report Filed On 2/18/2020	Cisneros, Jessica

**Missing Information - 24 Hour Report**  
**Taking Texas to the Top (C90017963)**

<b>Name</b>	<b>Date</b>	<b>Amount</b>	<b>Purpose</b>	<b>Candidate</b>
Aclise, Latisha	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Aclise, Latisha	3/1/20	\$17.00	Canvassing	Sanders, Bernard
Aclise, Latisha	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Aclise, Latisha	3/3/20	\$28.05	Canvassing	Sanders, Bernard
Benton, Markithia	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Benton, Markithia	3/1/20	\$17.00	Canvassing	Sanders, Bernard
Benton, Markithia	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Benton, Markithia	3/3/20	\$28.05	Canvassing	Sanders, Bernard
Bowman, Shaquille	2/29/20	\$16.00	Canvassing	Sanders, Bernard
Bowman, Shaquille	3/1/20	\$16.00	Canvassing	Sanders, Bernard
Bowman, Shaquille	3/2/20	\$16.00	Canvassing	Sanders, Bernard
Bowman, Shaquille	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Davis, Brian	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Davis, Brian	3/1/20	\$17.00	Canvassing	Sanders, Bernard
Davis, Brian	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Duplechain, Jaime	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Fontenot, Mirakle	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Fontenot, Mirakle	3/1/20	\$16.00	Canvassing	Sanders, Bernard
Fontenot, Mirakle	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Fontenot, Mirakle	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Hamilton, Jerry	2/29/20	\$16.00	Canvassing	Sanders, Bernard
Hamilton, Jerry	3/1/20	\$16.00	Canvassing	Sanders, Bernard
Hamilton, Jerry	3/2/20	\$16.00	Canvassing	Sanders, Bernard
Hamilton, Jerry	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Hodges, Byron	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Hodges, Byron	3/1/20	\$17.00	Canvassing	Sanders, Bernard
Hodges, Byron	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Hodges, Byron	3/3/20	\$28.05	Canvassing	Sanders, Bernard
Jacobs, Robert	2/29/20	\$16.00	Canvassing	Sanders, Bernard
Jacobs, Robert	3/1/20	\$16.00	Canvassing	Sanders, Bernard
Jacobs, Robert	3/2/20	\$16.00	Canvassing	Sanders, Bernard
Jacobs, Robert	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Kelly, Anthony	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Kelly, Anthony	3/1/20	\$17.00	Canvassing	Sanders, Bernard

**Missing Information - 24 Hour Report**  
**Taking Texas to the Top (C90017963)**

Name	Date	Amount	Purpose	Candidate
Kelly, Anthony	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Kelly, Anthony	3/3/20	\$28.05	Canvassing	Sanders, Bernard
Livingston, Mallory	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Livingston, Mallory	3/1/20	\$17.00	Canvassing	Sanders, Bernard
Livingston, Mallory	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Livingston, Mallory	3/3/20	\$28.05	Canvassing	Sanders, Bernard
Monarch Printing	2/29/20	\$1,851.07	Printing	Sanders, Bernard
Moore, Marcus	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Patterson, Christopher	2/29/20	\$16.00	Canvassing	Sanders, Bernard
Patterson, Christopher	3/1/20	\$16.00	Canvassing	Sanders, Bernard
Patterson, Christopher	3/2/20	\$16.00	Canvassing	Sanders, Bernard
Patterson, Christopher	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Rivers, Camry	2/29/20	\$16.00	Canvassing	Sanders, Bernard
Rivers, Camry	3/1/20	\$16.00	Canvassing	Sanders, Bernard
Rivers, Camry	3/2/20	\$16.00	Canvassing	Sanders, Bernard
Rivers, Camry	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Romero, Karla	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Skinner, Dalton	3/2/20	\$16.00	Canvassing	Sanders, Bernard
Skinner, Dalton	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Spencer, Valencia	3/3/20	\$15.30	Canvassing	Sanders, Bernard
St Julien, Keuindarius	2/29/20	\$16.00	Canvassing	Sanders, Bernard
St Julien, Keuindarius	3/1/20	\$16.00	Canvassing	Sanders, Bernard
St Julien, Keuindarius	3/2/20	\$16.00	Canvassing	Sanders, Bernard
St Julien, Keuindarius	3/3/20	\$26.40	Canvassing	Sanders, Bernard
Thomas, Oscar	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Thomas, Oscar	3/1/20	\$17.00	Canvassing	Sanders, Bernard
Thomas, Oscar	3/3/20	\$28.05	Canvassing	Sanders, Bernard
Wallace, Daonna	2/29/20	\$17.00	Canvassing	Sanders, Bernard
Wallace, Daonna	3/1/20	\$17.00	Canvassing	Sanders, Bernard
Wallace, Daonna	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Williams, Joshua	2/29/20	\$16.00	Canvassing	Sanders, Bernard
Williams, Joshua	3/1/20	\$17.00	Canvassing	Sanders, Bernard
Williams, Joshua	3/2/20	\$17.00	Canvassing	Sanders, Bernard
Williams, Joshua	3/3/20	\$26.40	Canvassing	Sanders, Bernard